

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONOS, INC.,

Plaintiff,

v.

GOOGLE LLC

Defendant.

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CIVIL ACTION 6:20-cv-00881-ADA

**PLAINTIFF’S FIRST SET OF FACT DISCOVERY REQUESTS FOR
THE PRODUCTION OF DOCUMENTS AND THINGS TO DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Order Governing Proceedings - Patent Case, Plaintiff Sonos, Inc. (“Sonos”) propounds the following requests to Defendant Google LLC (“Google”) for the production of the documents and things specified below for inspection and copying. The documents and things shall be produced within thirty days from the service of these requests to Sonos’s counsel, Lee Sullivan Shea & Smith LLP, 656 W. Randolph St., Chicago, Illinois 60661. This is a continuing request for documents and things as they become available to you.

DEFINITIONS AND INSTRUCTIONS

For purposes of responding to these requests, the following definitions and instructions shall apply:

1. The Definitions and Instructions set forth in Sonos’s First Set of Fact Discovery Interrogatories for to Defendant are incorporated by reference and apply to these discovery requests, in addition to those stated below.

2. The terms “Plaintiff” and “Sonos” shall mean Sonos, Inc., any predecessor,

REQUEST NO. 21

All documents and things concerning any test, study, or evaluation of the Accused Instrumentalities, whether internal or external, including but not limited to any alpha test, beta test, user study, or third-party approval process for any Accused Instrumentality.

REQUEST NO. 22

All documents and things concerning use or demonstration of, or training related to, the Accused Instrumentalities by Google or by any third party (including but not limited to customers of the Accused Instrumentalities).

REQUEST NO. 23

All documents and things concerning the manufacture of each Accused Pixel Device and Accused Cast-Enabled Media Player, including but not limited to bills of materials, costs of goods, and documents concerning any pre-installed software (e.g., firmware and/or any Accused Cast-Enabled Apps).

REQUEST NO. 24

All documents and things concerning communications between Defendant and any third party regarding the Accused Instrumentalities, including but not limited to communications between Defendant and customers of the Accused Instrumentalities and feedback from customers of the Accused Instrumentalities relating thereto.

REQUEST NO. 54

All documents and things concerning any actual or prospective agreement and/or relationship between Defendant and any third-party streaming media service provider (e.g., Spotify, TuneIn, iHeartRadio, TIDAL, Amazon Music, Deezer, etc.) regarding the Accused Instrumentalities.

REQUEST NO. 55

All documents and things concerning any royalty base or royalty rate related to the Accused Instrumentalities or any other product or service connected to and/or promoted by the Accused Instrumentalities.

Dated: August 7, 2021

Respectfully submitted,

By: /s/ Cole B. Richter

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